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## Attorneys for Defendants

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ALEKSEI BELIAKOV,  
Plaintiff,

V.

KRISTI NOEM, in her official capacity as Secretary of the United States Department of Homeland Security, *et al.*,

### Defendants.

Case No. 3:25-cv-01498 TSH

**JOINT STATUS REPORT IN RESPONSE TO  
THE COURT'S ORDER AND STIPULATION  
TO CONTINUE THE DEADLINE FOR  
DEFENDANTS' RESPONSE TO PLAINTIFF'S  
COMPLAINT; AND [PROPOSED] ORDER**

Plaintiff and Defendants hereby respond to the Court's order directing the parties to provide a joint status report, Dkt. No. 11, and the parties submit this stipulation requesting the Court to continue the deadline for Defendants' response to Plaintiff's complaint. On May 29, 2025, the Court granted the parties' stipulation to extend time for Defendants' response to Plaintiff's complaint, setting the due date for Defendants' response to May 28, 2025. *See* Dkt. 14. Defendants inadvertently missed the filing deadline for their response due to an administrative calendaring error that set the due date on a different date. Defendants sincerely apologize to the Court for their failure to comply with the deadline as a result of this inadvertent administrative error.

The parties conferred and hereby respectfully request the Court to allow a brief extension for

1 Defendants to file their response to the complaint and set the deadline for June 16, 2025. The parties  
2 make this request because Defendants' counsel has been handling multiple cases with emergency  
3 deadlines, including a motion for temporary restraining order filed on June 6, 2025, and counsel needs  
4 additional time to prepare and to finalize Defendants' response. In view of the agreed-upon extension for  
5 Defendants' response to the complaint, the parties request that Defendants must file their motion for  
6 summary judgment by August 13, 2025.

7 Dated: June 13, 2025

Respectfully submitted,<sup>1</sup>

8 CRAIG H. MISSAKIAN  
United States Attorney

10 /s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
11 Assistant United States Attorney  
Attorneys for Defendants

12 Dated: June 13, 2025

13 /s/ Arthur Minas  
14 ARTHUR MINAS  
Minas Law  
15 Attorney for Plaintiff

18 [PROPOSED] ORDER

19 Pursuant to stipulation, IT IS SO ORDERED.

21 Date: June 17, 2025

22   
23 THOMAS S. HIXSON  
24 United States Magistrate Judge

25  
26  
27 <sup>1</sup> In accordance with Civil Local Rule 5-1(i)(3), the filer of this document attests that all  
signatories listed herein concur in the filing of this document.  
28 Joint Status Report and Stipulation  
C 3:25-cv-01498 TSH

## **DECLARATION OF ELIZABETH D. KURLAN**

I, Elizabeth D. Kurlan, declare and state as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Northern District of California and counsel of record for the federal Defendants in the above-captioned action.

2. On May 29, 2025, the Court granted the parties' stipulation to extend time for Defendants' response to Plaintiff's complaint, setting the due date for Defendants' response to May 28, 2025. *See* Dkt. 14. Unfortunately, I inadvertently missed the filing deadline for Defendants' response due to an administrative calendaring error that set the due date on a different date. I sincerely apologize to the Court for this oversight and will be mindful of all set dates moving forward.

3. My office contacted Plaintiff's counsel regarding Defendants' request for a brief period of additional time to prepare their response to the complaint, and Plaintiff consented to the request.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

DATED: June 13, 2025

/s/ Elizabeth D. Kurlan  
ELIZABETH D. KURLAN  
Assistant United States Attorney